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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF PARTIES'  
AMENDED JOINT PROPOSED  
PRETRIAL ORDER**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 I make this declaration in support of Waymo’s Administrative Motion to File Under Seal  
7 Portions of Amended Joint Proposed Pretrial Order, filed concurrently herewith (the  
8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following  
9 materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Amended Joint Proposed Pretrial Order	Highlighted Portions	Waymo (green highlighting)
Appendix A to Joint Proposed Pretrial Order	Entire Document	Waymo; Defendants
Appendix D to Joint Proposed Pretrial Order	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)

16  
17 2. Specifically, the green highlighted portions of the Amended Joint Proposed Pretrial  
18 Order and Appendix D thereto, as well as the entirety of Appendix A to the Amended Joint Proposed  
19 Pretrial Order, contain or refer to trade secret and/or confidential business information, which Waymo  
20 seeks to seal.

21 3. The green highlighted portions of the Amended Joint Proposed Pretrial Order, as well  
22 as the entirety of Appendix A to the Amended Joint Proposed Pretrial Order contain, reference, and/or  
23 describe Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential  
24 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR  
25 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as  
26 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-  
27 31). The public disclosure of this information would give Waymo’s competitors access to  
28 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such

5. Waymo's request to seal is narrowly tailored to those portions of the Amended Joint Proposed Pretrial Order and Appendices A and D to the Amended Joint Proposed Pretrial Order that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on November 21, 2017.

-3- CASE No. 3:17-cv-00939-WHA

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CORREDOR DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven